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August 25, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2203
New York, New York 10007

Re: The City of New York v. Arm or Ally, LLC, et al, Case No. 1:22-cv-05525-JMF

Dear Judge Furman,

The undersigned represents Defendant Indie Guns, LLC (“Indie Guns”), in the above-referenced action. Indie Guns was served with process on August 4, 2022. [DE 37]. Accordingly, consistent with Federal Rule of Civil Procedure 15(a)(3), it is Indie Guns’ understanding that it has until August 25, 2022, to respond to the Amended Complaint, [DE 30].

With this deadline approaching, Indie Guns respectfully seeks an extension of the deadline for responding to the City’s Amended Complaint to Friday, September 9, 2022. The City has consented to the relief sought in this motion. This Court has previously permitted all Defendants an extension to September 9, 2022 in the related case, S.D.N.Y. Case No. 1:22-cv-6124, per [DE 26] in that case.

Indie Guns requests this extension to completely review and assess defenses, assure the responses in the cases are not disparate, and to fully explore settlement negotiations in the instant case. This is Indie Gun’s first request for an extension and will not affect other scheduled deadlines.

Respectfully submitted,

/s/ Christian W. Waugh
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*Appearing *pro hac vice*

Counsel for Defendant Indie Guns, LLC

cc: All counsel of record via ECF

So Ordered:

Jesse M. Furman, U.S.D.J.
United States District Court